



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

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NAS SOUTH WEYMOUTH
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November 27, 2001

Mr. Mark Leipert
Northern Division
Naval Facilities Engineering Command
10 Industrial Hwy., Mail Stop #82
Lester, PA 19113-2090

Subject: Comments on Draft Phase II Environmental Baseline Survey Decision Document
for Review Item Area 78B: Undocumented UST Removal - UST No. 44

Dear Mr. Leipert:

The United States Environmental Protection Agency (EPA) has reviewed the Draft Phase II
Environmental Baseline Survey (EBS) Decision Document for Review Item 78B:
Undocumented UST Removal - UST No. 44. EPA's comments on this document are in
Attachment 1.

If you have any questions please call me at (617) 918-1382.

Sincerely,

Patty Marajh-Whittemore
Remedial Project Manager

cc: Dave Barney/SOWEY NAS
Dave Chaffin/MADEP
Bill Brandon/Steve DiMattei/Betsy Mason/EPA
RAB Members
Ken Goff/SSTTDC
Kathleen Creighton/Stone & Webster
Peter Golonka/Gannett Fleming

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ATTACHMENT 1

General Comments

1. The Work Plan for this site called for installation and sampling of one groundwater monitoring well, MW07-006. The well was installed, but slow recharge prevented the well from stabilizing at a steady flow during purging and sampling. This represents overly rigid adherence to the low-flow protocol. Although the protocol prescribes a steady groundwater level during the purge and sampling, it acknowledges that it is sometimes difficult to achieve the ideal conditions for sampling. In particular, the USEPA Region I Low Stress SOP states, "If the recharge rate of the well is lower than extraction rate capabilities of currently manufactured pumps and the well is essentially dewatered during purging, then the well should be sampled as soon as the water level has recovered sufficiently to collect the appropriate volume ... Samples may then be collected even though the indicator field parameters have not stabilized." The well should be resampled to verify that groundwater has not been impacted at this site. If the well cannot be pumped at a steady-state condition, a sample should be taken according to the recommendation quoted in the foregoing. In this event, the field parameters will not be available to verify that stable groundwater flow was achieved. Nonetheless, the sample can be analyzed, particularly for organic contaminants, and the results can be viewed with the appropriate reservations.
2. The decision document should include a discussion as to why not collecting the groundwater sample at MW07-006 does not leave a data gap at this RIA.
3. The report states on Page 7, Section 4.2, that no ecological exposure pathways were identified for this RIA. The site description, which describes the RIA as paved and flat with a few areas of bare ground or grass, generally supports this statement. To fully close the book on this RIA, from an ecological perspective, please confirm, and indicate in the Decision Document, that 1) any grassy areas at RIA 78B do not amount to significant habitat, and 2) there are no nearby wetlands or aquatic systems which might receive groundwater from the site.
4. Was the Navy able to precisely pinpoint the former location of UST 44? If so, both the location and the depth of UST 44 should be included in this Decision Document.

Specific Comments

1. Page 3, Section 1.2: The text states, "Two subsurface soil samples were collected near the boundary of the excavation from which the tank was removed." However, based on the sample locations shown on Figure 2, SB07-005 appears to be located some 7 meters SSW of the excavation. What is the rationale for choosing this location?

2. Page 4, Section 2.1: The first sentence indicates that subsurface soil was collected from two locations. However, subsurface soil sampling was performed at three locations. Please clarify the text.
3. Appendix 78B-2: The bottom photo in this Appendix shows three geoprobe holes. It is unclear why there are three holes when only one sample was collected from this location. Please clarify the identity and purpose of the three holes shown in the photograph.